



## OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich  
County Executive


Tiffany Ward  
Director

### MEMORANDUM

June 23, 2022

To: Jennifer Bryant, Director  
Office of Management and Budget

cc: Gabe Albornoz, President  
County Council

From: Tiffany Ward, Director  
Office of Racial Equity and Social Justice 

Re: Racial Equity Impact Assessment (REIA) for Supplemental Appropriation (SA) #22-92  
FY22 Operating Budget, Department of Transportation, Taxicab Accessibility,  
Transportation Services Improvement Fund

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #22-92 Taxicab Accessibility Transportation Services Improvement Fund is likely to advance some aspects of racial equity and social justice related to transportation equity in the County, but further investments in the quality, safety, and reliability of services are necessary to realize the full the impact of increasing the supply of wheelchair accessible vehicles.
- II. **BACKGROUND:** The purpose of Supplemental Appropriation 22-92 is to fund activities under the Transportation Services Improvement Fund (TSIF) to address reported increased demand for accessible transportation services in the County. Activities include reimbursement for the purchase or retrofit of a wheelchair accessible taxicab vehicles; reimbursing drivers of accessible taxicab vehicles who successfully transport passengers requiring wheelchair service; guaranteed fare of ten dollars to taxicab drivers for both accessible and non-accessible Call-n-Ride trips that meter under ten dollars; taxicab licensee reimbursement for annual Passenger

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Vehicle License (PVL) renewal and transfer fees; and limited insurance reimbursement for accessible taxicabs.

In April 2022, ORESJ conducted a racial equity impact assessment (REIA) of Supplemental Appropriation #22-82. In that REIA, ORESJ outlined the racial disparities and other inequities shaping the need for accessible transportation options as well as policy incentives to support taxicab operators in their delivery of those services. While the context of that REIA was most closely related to the cost of fuel and its impacts on operators, the REIA described the structural inequities that make accessible transportation critical for individuals with disabilities, low-income, and elderly people. Therefore, ORESJ recommends those considering the racial equity impacts of SA #22-92 do so by first reviewing the REIA of Supplemental Appropriation #22-82<sup>1</sup>.

In addition to our assessment of SA #22-82, ORESJ reviewed Code of Montgomery County Regulation 53.801.01 governing the use of Transportation Service Improvement Funds<sup>2</sup> as well as information provided about passenger feedback and demand for wheelchair accessible rides.

In its research, ORESJ found that this supplemental appropriation is the continuation of ongoing efforts in the County to expand access to wheelchair accessible rides, specifically with a goal of making 100% of operator fleets wheelchair accessible by 2025<sup>3</sup>. There are a number of commissions and boards that monitor and advise on progress towards this goal as well regional efforts to increase the percentage of wheelchair accessible vehicles in jurisdictions' fleets. This supplemental appropriation will address cost barriers reported by taxicab operators, which will contribute to increasing the supply of wheelchair accessible vehicles in the County.

As with other areas of transportation equity, the mere presence or quantity of transportation options does not translate into equitable access or experience for all residents. There are therefore ongoing efforts in the County to understand whether current and future supply meets the quality, safety, and reliability needs of riders—from trip booking to drop off. From October to November 2021, the Montgomery County Department of Health and Human Services, Department of Transportation, and the Taxicab Services Commission administered

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<sup>1</sup> Available here: <https://www.montgomerycountymd.gov/ore/Resources/Files/22-82.pdf>

<sup>2</sup> ARTICLE VIII. TRANSPORTATION SERVICES IMPROVEMENT FUND REQUIREMENTS, SEC. 53-801 — REGULATIONS COMCOR 53.801.01 Transportation Services Improvement Fund. Available at: [https://codelibrary.amlegal.com/codes/montgomerycounty/latest/montgomeryco\\_md\\_comcor/0-0-0-88544](https://codelibrary.amlegal.com/codes/montgomerycounty/latest/montgomeryco_md_comcor/0-0-0-88544)

<sup>3</sup> Luz Lazo. The Washington Post. "Montgomery aims to make all taxicabs wheelchair accessible by 2025". July 24, 2015. Available at: <https://www.washingtonpost.com/news/dr-gridlock/wp/2015/07/24/montgomery-aims-to-make-all-taxicabs-wheelchair-accessible-by-2025/>

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a survey of residents 65 and above and residents with disabilities about their experiences using the County's taxicab services. The use of a survey tool like this and ongoing community engagement approaches are consistently recommended as practices for expanding transportation equity, particularly in the distribution of benefits and burdens, analyzing access to opportunity, and achieving fair governance<sup>4</sup>. In fact, in a review of six tested tools for advancing equity in transportation conducted by Center for Neighborhood Technology and Community Science, all six tools included the role of qualitative data in understanding how communities of color and low-income communities have been most harmed by past transportation decisions<sup>5</sup>. Complementing the expertise of staff with lived experience and deep community relationships with ongoing public engagement efforts is therefore critical. Based on the scope of this REIA, it also appears to be a strength of the program under which this supplemental appropriation is situated.

Responses to the survey shed light on wheelchair and accessible taxicab services as a critical piece of transportation infrastructure in the County, with more than 70% of respondents reporting either current or previous use of the taxicab service. Survey responses also raised concerns about the safety and customer service training of taxicab drivers and dispatchers, particularly given the client population; unpredictable wait times; and inconsistent standards for reporting or addressing complaints. While addressing each area of concern is beyond the scope of this supplemental appropriation, the resolution and improvement of these issues will invariably have an impact on whether efforts to increase the supply of wheelchair accessible vehicles helps to advance racial equity and social justice in the County.

cc: Ken Hartman, Director, Office of Strategic Partnership, Office of the County Executive  
Chris Conklin, Director, Department of Transportation

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<sup>4</sup> Edward W. De Barbieri. "Community Engagement and Transportation Equity". Fordham Urban Law Journal. Volume 44. Number 4 Colloquium – Getting There From Here: An Exploration of Regionalism and Transportation in the United States. Article 6. 2017. Available at: <https://ir.lawnet.fordham.edu/cgi/viewcontent.cgi?article=2706&context=ulj>

<sup>5</sup> Center for Neighborhood Technology and Community Science. Tools for Equitable Mobility Practices. Guide. December 2021. Available at: <https://search.issuelab.org/resource/tools-for-equitable-mobility.html>